

### REMARKS

Applicants have canceled claims 11-16, 26-31 and 41-46.

Claims 1-10, 17-25 and 23-40 are pending for further examination.

#### Claim amendments

Applicant has canceled additional claims in an attempt to move prosecution forward.

Also, applicant's attorney thanks the Examiner for clarifying, in the Office action of May 27, 2009, the antecedent basis issues raised with respect to various phrases in some of the dependent claims. Applicant has amended the dependent claims in view of the Examiner's helpful comments and suggestions for clarification.

Applicant respectfully requests entry of the foregoing amendments, which should overcome the section 112, par. 2 rejections and which should place the application in condition for allowance or in better condition for appeal should that be necessary.

Should the Examiner be of the opinion that further amendments may be desirable to address any other antecedent or similar issues, applicant requests the Examiner to contact the undersigned attorney.

#### Rejections under 35 U.S.C. §103(a)

The Office action rejects the pending claims under 35 U.S.C. §103(a) as obvious from U.S. Patent No. 7,117,199 (Frank) in view of U.S. Patent No. 5,191,525 (LeBrun).<sup>1</sup>

Applicant respectfully requests reconsideration.

One aspect of the invention relates to presenting an interactive graphical depiction of a form (*i.e.*, a graphical depiction of a document with one or more areas for insertion of information) through a computer network to allow a user to request information relating to a selected location on the form by interacting with the graphical depiction of the form. In

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<sup>1</sup> At page 6, par. 5, the Office action states that the basis of the rejections is 35 U.S.C. 102(e) and that the claims are rejected as "anticipated" by Frank in view of LeBrun. Applicant assumes this was a typographical error on the part of the Office and that the reference should have been to 35 U.S.C. §103(a) as indicated in par. 4.

response, information relating to the selected location on the form is delivered through the network.

The invention can facilitate, for example, a user's planning, regulatory compliance and research needs by allowing the user to select a particular part of the form (*e.g.*, a tax form) about which the user desires information and, in response, to receive such information relating specifically to the selected part of the form.

The Frank patent discloses a computer system that presents a map interface, which enables a user to pose a query that represents a spatial domain(*i.e.*, a geographical location or a virtual layout, *e.g.*, of a planned housing development (7:8-10).<sup>2</sup> The search criteria that define the query include a free text entry query and a domain identifier. Although the map interface can enable the user to input the domain identifier as part of the search criteria by interacting with the displayed map (3:46-51), the search query itself is entered using text entry tools (8:42-43).

In contrast to the subject matter of independent claim 1, the Frank patent has absolutely nothing to do with a graphical depiction of a "form" (*i.e.*, a document with one or more areas for insertion of information) as recited in the claims. Furthermore, the distinction between a map interface and a graphical depiction of a "form" is significant. For example, selecting a "location" on a map identifies a geographical location, which is very different from selecting a "location" on a form to identify a part of the form for which information is desired.

The Office action acknowledges that Frank does not disclose an interactive, graphical depiction of a form (such as a tax form), but relies on LeBrun for its disclosure of images of tax forms in digital format. The Office action alleges, incorrectly, that it would have been obvious to combine the disclosure of LeBrun with the disclosure of Frank so as to obtain the subject matter of the pending claims. As explained below, neither Frank, nor LeBrun, nor any reasonable combination, would have rendered obvious use of a graphical depiction of a form (as claimed) to facilitate delivery of information about a selected location on the form through a user's interaction with the graphical depiction of the form.

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<sup>2</sup> References to column and line numbers are in the format (column: lines).

In particular, as explained in greater detail below, even if LeBrun were somehow combined with Frank's system, at most a person of ordinary skill might have had a reason to incorporate LeBrun's system as part of Frank's data collection process 30 or data analysis process 40. There would have been absolutely no reason to replace Frank's graphical map interface with a digital image of a tax or other form as disclosed by LeBrun.

LeBrun discloses a system for automatically capturing, identifying, indexing and recording data and images from an incoming stream of documents (1:31-35). The system can be used for document retrieval and storage (3:22-23). In particular, the system is said to result in improvements over known data collection centers (3:3-6), such as speeding up document processing and reducing errors (3:13-18). As part of the process of capturing, identifying and indexing, the system converts documents, such as tax or other forms and supporting pages, into digital data.

For ease of reference, FIG. 1 of Frank is reproduced below, which shows various subsystems, as well as the map interface 80 presented to a user to enable the user to pose a query to the storage 22 and view a representation of the results arranged on the map (5:52-56). Frank's system includes a storage system 22, which contains information in the form of documents, as well as subsystems for data collection 30 and data analysis 40, among others. The data collection process 30 is for gathering new documents, which are stored along with previously stored documents so that they are made available for subsequent retrieval in response to a user's query. The document gathering process 30 includes a crawler process, a page queue and a metasearcher process (14:55-59). The data analysis process 40 is for extracting information and meta-information from the documents (16:39-43). The data analysis process 40 includes an indexer process 46 (16:44), which analyzes documents to prepare data structures that accelerate the search process.

Thus, Lebrun's system performs tasks (*e.g.*, data and document collection; indexing) that are similar in nature to the functions of Frank's storage system with its data collection 30 and data analysis 40 subsystems.

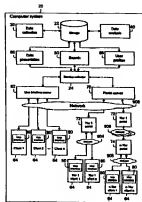


FIG. 1

Frank—FIG. 1

In view of the disclosures of Frank and LeBrun, even if LeBrun were somehow combined with Frank's system, at most a person of ordinary skill might have incorporated LeBrun's system as part of Frank's storage system 22 and/or data collection and data analysis subsystems 30, 40 so as to facilitate collection, analysis, searching and/or retrieval of digital images of documents (including tax forms) in response to a query entered by a through Frank's graphical map interface. There would have been absolutely no reason to replace Frank's graphical map interface 80 with an interactive digital image of a tax or other form.

The Office action points to FIG. 6 of LeBrun as illustrating an image of tax form. Applicant does not dispute that digital images of tax forms were known. But that is irrelevant to the patentability of the pending claims. It is clear from LeBrun that tax or other forms are simply used as examples of the type of documents that can be processed as part of an incoming stream of documents and stored for subsequent retrieval. Again, there would have been absolutely no reason to replace Frank's graphical map interface 80 with an interactive graphical depiction of a tax or other form.

LeBrun also discloses that the image based document processing system manages document entry and flow within a business by allowing user interaction with the electronically captured documents (1:12-14). For example, the system can route transactions and associated document images to specific human operators for review (6:12-21). Likewise, graphic images of

documents can be retrieved and presented to clerk in support of a customer inquiry (22:40-43). The nature of such interaction is substantially similar to the type of interaction that can occur with documents stored in and retrieved by Frank's system (*i.e.*, the system stores digital images of documents (whether the images correspond to tax forms or other documents) which subsequently can be retrieved and presented to a user via a user interface).

Thus, as relevant to the subject matter of the pending claims, LeBrun simply discloses that it is possible to store tax and other forms in digital format for subsequent processing, analysis and retrieval. At most, a person of ordinary skill might conclude that such forms could be included among the documents stored by Frank's system and retrieved in response to a user query submitted through the map interface 80. However, a person of ordinary skill would have had no reason to replace the map in Frank's user interface 80 with a graphical depiction of a tax or other form so as to allow a user to select a section of the form through interaction with the form and receive results based on the selected section.

At least for the foregoing reasons, claim 1, as well as its dependent claims, should be allowed.

Independent claims 17 and 32, as well as their respective dependent claims, should be allowed for similar reasons.

### Conclusion

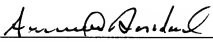
It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

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Page : 13 of 13

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